



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460

MAY 29 2003

OFFICE OF
SOLID WASTE AND EMERGENCY
RESPONSE

Carolyn W. Merritt
Chief Executive Officer
U.S. Chemical Safety and Hazard Investigation Board
2175 K Street N.W., 4th Floor
Washington, DC 20037-1809

Re: CSB Recommendations 98-006-I-NJ-R08 and R09

Dear Ms. Merritt:

This letter is in reply to an inquiry as to the status of two recommendations from the *Investigation Report* for Morton International, Inc, Paterson, NJ. Your report recommends:

- "1. Issue joint guidelines on good practices for handling reactive chemical process hazards."
CSB Recommendation 98-006-I-NJ-R08
- "2. Participate in a hazard investigation of reactive chemical process safety conducted by the CSB."
CSB Recommendation 98-006-I-NJ-R09

In response to the first recommendation, 98-006-I-NJ-R08, we collaborated with the Center for Chemical Process Safety (CCPS), of the American Institute of Chemical Engineers, on guidance for the safe handling of reactive materials. In October, 2001, CCPS released the safety alert entitled *Reactive Material Hazards* (<http://www.aiche.org/ccps/pdf/reactmat.pdf>) which describes what facilities should do in order to fully understand the reactive properties of chemicals. This alert is available at no charge from the CCPS website. EPA provides a link to the CCPS publication from our web site. In 2003, CCPS published *Essential Practices for Managing Chemical Reactivity Hazards*, which provides guidance on management systems and hazard assessment protocols for reactive materials. EPA staff participated in both of these efforts and are looking at ways to make the guideline widely available to all RMP-covered facilities. We consider recommendation 98-006-I-NJ-R08 to be complete.

Additionally, EPA has issued several Chemical Safety Alerts which provide suggestions to facilities on specific items of concern to the industry involving process safety management. Many past Alerts have involved reactive hazards, and we are considering additional alerts on specific reactive chemical process hazards.

In response to the second recommendation, 98-006-I-NJ-R09, we participated in the hazard investigation of reactive chemical process safety, led by the CSB. This investigation was completed with the issuance of the CSB's final report on September, 2002. We consider recommendation 98-006-I-NJ-R09 to be complete.

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We look forward to continuing to work with CSB and OSHA on chemical safety issues. Please call me, or Craig Matthiessen, at 202-564-8600 if you have any questions or would like to further discuss this matter.

Sincerely,

A handwritten signature in black ink, appearing to read "Deborah Y. Dietrich".

Deborah Y. Dietrich, Director
Chemical Emergency Preparedness
and Prevention Office

cc. Marianne L. Horinko
Craig Matthiessen
Dorothy McManus
Breda Reilly
Mike Marshall, OSHA
Frank Frodyma, OSHA
Richard Fairfax, OSHA
Douglas Bell, CSB